

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Christina V. Miller, Esq.
5 Nevada Bar No. 12448
6 Lindsay D. Robbins, Esq.
7 Nevada Bar No. 13474
8 7785 W. Sahara Ave., Suite 200
9 Las Vegas, NV 89117
10 (702) 637-2345; Fax: (702) 946-1345
11 cmiller@wrightlegal.net

12 *Attorneys for Plaintiff, Wells Fargo Bank, National Association, as Trustee for Morgan Stanley*
13 *Capital I Inc. Trust 2006-HE1, Mortgage Pass-Through Certificates, Series 2006-HE1*

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WELLS FARGO BANK, NATIONAL
ASSOCIATION, AS TRUSTEE FOR
MORGAN STANLEY CAPITAL I INC.
TRUST 2006-HE1, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2006-
HE1,

Plaintiff,

vs.

WESTCOR LAND TITLE INSURANCE
COMPANY; DOE INDIVIDUALS I through
X; and ROE CORPORATIONS XI through
XX, inclusive,

Defendants.

Case No.: 2:21-cv-00326-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY IN
SUPPORT OF COUNTER-MOTION
FOR PARTIAL SUMMARY
JUDGMENT [ECF NO. 14]**

[First Request]

Plaintiff, Wells Fargo Bank, National Association, as Trustee for Morgan Stanley Capital
I Inc. Trust 2006-HE1, Mortgage Pass-Through Certificates, Series 2006-HE1 (“Wells Fargo”)
and Defendant Westcor Land Title Insurance Company (“Westcor”), by and through their counsel
of record, hereby stipulate and agree as follows:

1. On January 22, 2021, Wells Fargo filed its Complaint in Eighth Judicial District Court,
Case No. A-21-828236-C [ECF No. 1-1];

- 1 2. On February 26, 2021, Westcor filed its Petition for Removal to this Court [ECF No.
- 2 1];
- 3 3. On March 5, 2021, Westcor filed a Motion to Dismiss [ECF No. 6];
- 4 4. On April 26, 2021, Wells Fargo filed an Opposition to the Motion to Dismiss and
- 5 Counter-Motion for Partial Summary Judgment [ECF Nos. 13 and 14 respectively];
- 6 5. On June 1, 2021, Westcor filed its Reply in support of the Motion to Dismiss [ECF
- 7 No. 19] and Opposition to the Counter-Motion for Partial Summary Judgment [ECF
- 8 No. 20];
- 9 6. Wells Fargo's deadline to file its Reply in support of the Counter-Motion for Partial
- 10 Summary Judgment is June 15, 2021;
- 11 7. Wells Fargo's counsel is requesting a 30-day extension until July 15, 2021, to file its
- 12 Reply in support of the Counter-Motion for Summary Judgment;
- 13 8. This extension is requested to allow Wells Fargo additional time to analyze the
- 14 arguments raised and legal authorities cited by Westcor in its Opposition to the
- 15 Counter-Motion for Partial Summary Judgment;

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 9. Counsel for Westcor does not oppose the requested extension;

2 10. This is the first request for an extension which is made in good faith and not for
3 purposes of delay.

4 **IT IS SO STIPULATED.**

5 DATED this 15th day of June, 2021.

DATED this 15th day of June, 2021.

6 WRIGHT, FINLAY & ZAK, LLP

MAURICE WOOD

7 /s/ Christina V. Miller

/s/ Brittany Wood

8 Christina V. Miller, Esq.

Brittany Wood, Esq.

9 Nevada Bar No. 12448

Nevada Bar No. 7562

7785 W. Sahara Ave., Suite 200

8250 West Charleston Blvd., Suite 100

10 Las Vegas, NV 89117

Las Vegas, Nevada 89117

11 *Attorneys for Plaintiff, Wells Fargo Bank,*
12 *National Association, as Trustee for Morgan*
13 *Stanley Capital I Inc. Trust 2006-HE1,*
Mortgage Pass-Through Certificates, Series
2006-HE1

Attorney for Defendant, Westcor Land Title
Insurance Company

14 **IT IS SO ORDERED.**

15 Dated June 16, 2021.

16
17
18 
19 UNITED STATES DISTRICT COURT JUDGE